

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF INDIANA
FORT WAYNE DIVISION**

FORD MOTOR CREDIT COMPANY LLC,)
)
)
Plaintiff,)
)
vs.)
) Case No.: 1:19-CV-00502-HAB-SLC
)
FINCANNON FORD, INC., f/k/a)
FINCANNON FORD-MERCURY, INC.,)
LINDA MUGHMAW, a/k/a)
LINDA FINCANNON,)
MATTHEW FINCANNON, and)
STANLEY BOURFF,)
)
Defendants.)

MOTION FOR ENTRY OF DEFAULT JUDGMENT

Upon the accompanying Memorandum of Law, Declaration of Bryan W. Banks, Declaration of Craig A. Leslie, Esq., and Declaration of Harley K. Means, Esq., and upon all papers and proceedings previously had herein, Plaintiff Ford Motor Credit Company LLC hereby moves the Court for entry of a default judgment against defendants Matthew Fincannon and Stanley Bourff pursuant to Federal Rule of Civil Procedure 55(b)(2). The grounds for this Motion are stated more fully in the Memorandum of Law and Declarations accompanying it, which are incorporated herein.

WHEREFORE, Ford Motor Credit Company LLC respectfully requests that the Court grant this Motion in its entirety and issue an Order granting Ford Motor Credit Company LLC judgment by default against the defendants Matthew Fincannon and Stanley Bourff, in the sum of \$1,407,612.74.

Dated: October 23, 2020

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By: /s/ Craig A. Leslie
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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing, and all papers in support of same, were filed on October 23, 2020. Notice of this filing will be sent to all parties registered to receive such notice by operation of the Court's electronic filing system. I hereby further certify that I caused a copy of the foregoing to be served via U.S. Mail, First Class, Postage Pre-Paid upon parties that are not registered to receive notice by operation of the Court's electronic filing system at their respective addresses listed on the electronic filing receipt. Parties may access this filing through the Court's electronic filing system.

/s/ Craig A. Leslie
Craig A. Leslie, Esq. (Pro Hac Vice)